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IDAHO CONSERVATION LEAGUE

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GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE

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These comments were delivered at the Lewiston public hearing on grizzly bear recovery for the Bitterroot Ecosystem, in a shorter version. I submit the comments as a representative for the Idaho Conservation League, ICL, as the group's conservation director.

1 In June 1996, the ICL Board of Directors reaffirmed its policy to support reintroduction of grizzly bears into central Idaho. ICL is just one of many groups of conservationists and wildlife advocates nationwide who believe the great grizzly bear deserves to run wild in the Northern Rockies. The best science tells us a sustainable, stable population of bears in Idaho is critical to bear survival in the region. Grizzly bears can and should roam the wildlands of Idaho, again.

The preferred alternative in the Draft Environmental Impact Statement addresses many concerns for a safe and productive reintroduction program. However, many changes should be made in the DEIS to establish a workable program for bears and for people.

Among the concerns or issues that should be changed in the final program are:

2 • Linkage with other existing grizzly populations must be part of any recovery plan. To establish a non-linkage policy, by law, as the proposal does, is contrary to all of the crucial reasons for a grizzly recovery program, which is to avert catastrophic events for the existing populations and to provide a larger population base for long-term survival.

A long-term plan for linkage through ecosystem restoration must be included in the Final Environmental Impact Statement.

• Habitat standards must be established in the recovery plan. Bear requirements for forage and security are well known. Basic standards must be outlined in the FEIS.

3 To leave habitat standards to the management team ignores the best available science and will only postpone establishment of requirements. The public deserves to know what bears need and where. Just dropping bears off in the middle of the wilderness is not sufficient management.

• Habitat standards should define allowable road densities for the full bear population area. Standards may vary throughout the population area, but must be based on bear biology.

• Existing Forest Plans are not sufficient for grizzly standards and guidelines. New standards and guidelines, specific to grizzly bears, must be established using specific data for bears

4 • Section 7 consultation with the U.S. Fish and Wildlife Service must be maintained, to assure habitat standards are not diminished by other activities. While the proposed nonessential experimental population may present some management advantages, to eliminate consultation will eliminate protection of habitat, decrease the room for bears to roam and postpone recovery and eventual delisting.

5 • The distinction between the recovery area and the experimental population area in the in Alternative 1 isn't based on useful habitat for bears but on political boundaries. A reintroduction area, where bears are initially released and limited to the designated wilderness makes sense. The division between a recovery area and a population area is confusing and is not based on bear needs.

• A true recovery area should be established using currently available information on food sources and other habitat requirements for bears. The recovery area would include the area north of the Lochsa River, where there is the most productive bear habitat in central Idaho.

6 • No surplus bears are available in any of the existing population clusters in the lower United States. The supposed surplus in the greater Yellowstone ecosystem is not confirmed by reliable surveys. Bears for reintroduction will have to come from Canada, where there are habitat similarities unlike Alaska.

7 • The citizen management committee is too heavily weighted to political appointees, without defined or established bear biology qualifications. The citizen management committee makeup puts politics first, and bear biology a distant second. Only five of the 15 members are likely to have any biological background, from the Nez Perce Tribe, the Fish and Wildlife Service, the Forest Service and the two state wildlife agencies. There is nothing to require even these representatives to be biologists.

The makeup of the management committee should be reversed, where two-thirds are qualified biologists or ecologists, and one-third are political appointees. Qualifications should be spelled out.

8 • The actual recovery plan should be further outlined in the FEIS and refined by the Fish and Wildlife Service for later publication and peer review, before it is turned over to a management committee for implementation. The management committee should be responsible for achieving the goals of the recovery plan, not for development of a recovery plan. Fish and Wildlife Service biologists, in consultation with the Nez Perce Tribe and state wildlife agencies, should draft the recovery plan.

9 • The management committee must be able to set policy for habitat standards for federal agencies, and on both private and state land. Relaxed standards of an experimental population are stretched too far in the DEIS, to eliminate any meaningful restrictions on take.

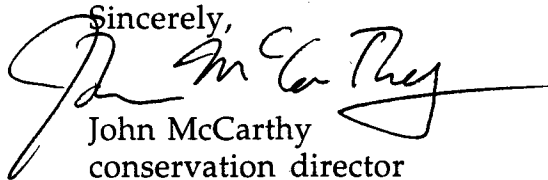
10 • The public information and education outreach program should extend beyond the one year "phase-in." Provisions should be made to continue education programs and to adjust special sanitation equipment

10 | needs. An ongoing education program should be incorporated into state hunter safety programs, schools, wildlife clubs and other community groups.

Unless these and other critical changes are made to Alternative 1 in the final plan, the preferred program for grizzly bear recovery would be Alternative 4. The increased restrictions on human activities in Alternative 4 may not make it the most socially desirable. But the biological emphasis in Alternative 4 increases the certainty of grizzly bear recovery, which is and must be the goal. Unless Alternative 1 can be strengthened in favor of bear recovery, it will not meet the requirements of the Endangered Species Act, which of course is to assure the survival of all species.

Unless the Alternative 1 can be modified to address critical concerns for habitat standards, linkage, scientific management, boundaries based on habitat, and ongoing education outreach, then the stronger but more restrictive Alternative 4 should be the preferred alternative.

Thank for the opportunity to comment. Please keep my name on all mailing lists.

Sincerely,

John McCarthy
conservation director